

October 16, 2020

VIA ECF

Hon. Jesse M. Furman
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Centre Street, Room 2202
New York, NY 10007

Re: In re Citibank August 11, 2020 Wire Transfers,
No. 1:20-cv-06539 (JMF)

Dear Judge Furman:

Pursuant to Section 7(C)(iii) of Your Honor's Individual Rules and Practices in Civil Cases (the "Individual Rules"), Plaintiff Citibank, N.A. ("Citibank") respectfully moves to redact portions of deposition testimony quoted in its response to the defendants' October 13 motion to compel, along with portions of deposition transcripts attached as exhibits.

Defendants have not consented to the public filing of these materials. Accordingly, Citibank is filing these materials in redacted form as required by the protective order, *see* Dkt. 81 at ¶ 11, but takes no position on whether the unredacted documents should be filed under seal.¹

As further required by Your Honor's Individual Rules, we have notified the defendants that they must file, within three days, a letter explaining the need to seal or redact Citibank's response and the exhibits thereto.

We are available to discuss this further at Your Honor's convenience.

Respectfully,

/s/ Christopher J. Hought
Christopher J. Hought

¹ *See* Dkt. 81 at page 18 ("This stipulation binds the parties to treat as confidential the documents so classified. This Court, however, has not reviewed the documents referenced herein; therefore, by so ordering this stipulation, the Court makes no finding as to whether the documents are confidential. That finding will be made, if ever, upon a document-by-document review pursuant to the procedures set forth in the Court's Individual Rules and Practices and subject to the presumption in favor of public access to 'judicial documents.'").